



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

June 6, 2005

Reply To
Attn Of: ETPA-088

Ref: 05-021-AFS

Dennis Duehren
C/O Ken Klingenberg
Montpelier Ranger District
Caribou-Targhee National Forest
322 North 4th Street
Montpelier, Idaho 83454

Dear Mr. Duehren:

The U.S. Environmental Protection Agency (EPA) has reviewed the **Three Basins Timber Sale Draft Environmental Impact Statement (DEIS)** (CEQ No. 20050160) according to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). The DEIS analyzes the no action alternative and three (3) action alternatives related to manipulating stand structure, species composition and fuels to move toward desired future condition (DFC), emphasizing timber production consistent with the regional forest plan. Alternative 2 is the Proposed Alternative to treat 708 acres (590 acres for timber harvest and 118 acres for prescribed fire burning); Alternative 3 was developed in response to limiting impacts on the roadless areas and wildlife characteristics; Alternative 4 was developed in response to concerns that the proposed alternative would exceed the RFP guidelines for created openings greater than 40 acres. The DEIS identifies Alternative 2 as the district's Preferred Alternative.

Based on our review we have rated the Preferred Alternative EC-1 (Environmental Concerns-Adequate). This rating and a summary of our concerns will be published in the *Federal Register*. A summary of the rating system we have used in conducting our review of the DEIS is enclosed for your reference.

Our main concerns focus on identified air impacts from prescribed burning, potential impacts to water quality, and questions regarding exceeding the RFP guidelines for created openings and visual quality objectives. Because Alternative 4 meets all RFP guidelines Alternative 4 could be viewed as the environmentally preferred alternative to support visual quality objectives and goshawk habitat guidelines, while still meeting the project purpose. EPA recommends that additional clarification in the final EIS be provided to further explain why the benefits are expected to be greater under Alternative 2 than Alternative 4.

EPA supports the management of roads, including 2.2 miles of decommissioning to restore unneeded roads to the natural landscape. EPA also values the candid discussion of considered tradeoffs and the clear discussion of the project's alignment with RFP guidelines.

Thank you for the opportunity to comment on the draft EIS. EPA appreciates the assistance provided by Ken Klingenberg, Project Team Leader, in responding to questions during our review. A copy of our detailed comments is enclosed. Please feel free to contact Peter Contreras at (206) 553-6708 with any questions.

Sincerely,

//S//

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosures

Cc: Leigh Woodruff, IOO/EPA

EPA Comments on the Three Basins Timber Sale Draft EIS

General Comments

The DEIS evaluates three alternatives, in addition to the no action alternative, to meet the purpose and need of the project. The alternatives clearly describe the goals of the project and evaluate key tradeoffs between alternatives relative to the regional forest plan (RFP) guidelines. The primary benefit of alternative 2 over alternative 4 appears to be that an additional 200 acres would be available for timber sale, and that the larger openings would more closely match a natural disturbance. All action alternatives would be expected to result in a one or two day degradation of air quality in Bailey Creek and Soda Springs communities, with some potential to degrade water quality as evidenced by some streams being listed on the 1998 Clean Water Act Section 303(d) list for impaired water quality from sediment. After reviewing the DEIS, EPA recommends that additional information be provided to explain the factors the Forest Service considers when exceeding the RFP guidelines, in this instance for visual quality objectives and created openings in goshawk nesting territories. We also recommend that the final EIS (e.g. at page S-8) or the Record of Decision summarize the key differences explaining why Alternative 2 is preferred. While the information is provided throughout the document, it would be helpful to the reader to have a basic summary in one place.

Air Quality

EPA recommends that additional information be provided in Section 4.10 to further explain the emissions estimates presented from the model for PM₁₀ and PM_{2.5} and the conclusion that cumulative air quality effects would be well within NAAQS and State of Idaho air quality standards. What are the emissions standards relative to total estimated emissions?

Section 10 also discusses the potential for burning restrictions that could be imposed as a result of cumulative impacts from other non-Forest Service activities in conjunction with this project. Please discuss what duration would be expected for burning restrictions as a result of the proposed project.

Water Quality

Page 4-80 indicates that there are no 303(d) listed streams in the area based on 2003 data, but section 3.2.2 discusses North Canyon and Meadow Creeks as 303(d) listed streams, using the 1998 assessment of 303(d) listed streams. EPA appreciates the inclusion of historical information indicating that sedimentation has been an issue at these areas in the past. Because of recognized historical impact, EPA recommends that the final EIS emphasize water quality BMPs that the project will use to ensure that current and future management practices contribute to the current trends of improvement. EPA recommends that the final EIS include a description of the distance of the historically impacted streams relative to the main haul roads and indicate which BMPs will be used to maintain the water quality improvements indicated by the 1998 to 2002 data. Also, for clarity, EPA suggests include a map highlighting the named streams discussed in the DEIS, including North Canyon and Meadow Creeks.

Regional Forest Plan Guidelines

The proposal to exceed visual quality objectives (VQOs) and created openings greater than 40 acres is an acknowledged departure from RFP guidelines. EPA recommends additional discussion for how RFP guidelines are observed by the Forest Service, and what guides the decision to exceed these guidelines. For example, page S-4 indicates that most of the project area lies within a full retention area and within a 5.2 prescription area. It is clear from the DEIS that emphasis is given to the 5.2 prescription designation of the area in the RFP, but little discussion is provided of the impacts associated with exceeding the VQO guideline. Additional discussion of the significance of exceeding this guideline is recommended, relative to the proposed action area, and relative to the broader landscape.

Fifteen timber harvest units are identified under the proposed action (two of which are associated with the prescribed burn). Since several of the units are contiguous to one or more other units, it appears that the RFP guideline not to exceed 40 acres could be more significant when looking at the project as a whole. For example, Table 2.4-1 identified seven units (1, 5, 6, 7, 8, 11, & 13) as exceeding the 40-acre opening guideline, ranging from 47 to 75 acres in size. However, several units (e.g. 11 & 12, 6-9, and 1-3) are contiguous and when combined would create openings of 113, 126, and 83 acres respectively, instead of the seven smaller units exceeding VQOs as currently described. Are these combined openings that would be created by contiguous units comparable to the size of the desired historical natural disturbances? Please provide additional discussion in the final EIS of the intent of the guideline limiting created openings to 40 acres in one harvest operation by even-aged silvicultural systems. Clarify in tables like 2.4-1 if the intent is to create these larger openings that would result from timber harvest in contiguous units.

Page 2-28 indicates that groups and blocks of reserve trees of differing sizes, shapes and spatial arrangements will be left in harvest areas. EPA recommends that the final EIS clarify how it will locate the islands of leave trees. What percentage of areal coverage (or total acreage) per unit is expected to remain in a given harvest area when trees are left? Can criteria be used to consider the ecological function or other desired benefits and minimize affects from exceeding the RFP guidelines for created openings? For example, in addition to the goal of mimicking a natural disturbance, could increasing the density of trees remaining between adjacent harvest units diminish the visual impacts? Is it possible to leave trees near ephemeral streams, seeps or other topographical water features that could enhance those resources? Could select placement minimize erosion potential from slopes in harvest areas to protect roads and prevent sedimentation buildup? The EIS currently suggests that the utility of the leave trees are in softening the amount of edge and mimic the natural landscape (pp. 4-73 & 74), and to create hiding cover for goshawks (p. 4-38). Please evaluate whether other beneficial functions could also be enhanced by leave tree placement.

Roads

EPA supports the proposed improvements that will decommission 2.2 miles of roads (Table 1.2-1) and reconstruction and closure of 1.2 miles of road (Table 2.4-3).

Editorial

Readability of figures. Several figures that are presented on black and white are difficult to interpret and subsequent EIS could be improved by using crosshatching or other shading combinations (e.g., compare Figure 3.1-1 with Figure 3.1-5). Alternatively, EPA recommends that page 1 include a website address in instances where the EIS figures can be found in color. Also, Appendix A—the figures provided are difficult to interpret in black and white, especially in differentiating ‘Mature/Old’ from ‘Young/Mid’. Cross hatching is recommended for the ‘Young/Mid’ designation to make the information more readable.

Figure 4.2-1 Structural Diversity Graphs. The dashed lines are not readily understandable from the information provided in the legend.